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21 *Attorneys for Defendants/Counterclaimants*

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**UNITED STATES DISTRICT COURT**

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**DISTRICT OF NEVADA**

30 PARADISE ENTERTAINMENT LIMITED, a  
 31 Bermuda corporation; and LT GAME INC., a  
 32 Nevada corporation; and LT GAME LIMITED,  
 33 a British Virgin Islands corporation,

34 Case No. 2:24-cv-00428-JCM-BNW

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**UNOPPOSED MOTION TO STRIKE AND**  
**REPLACE ECF NO. 81-1**

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 38 Plaintiffs,  
 39 v.  
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 41 EMPIRE TECHNOLOGICAL GROUP  
 42 LIMITED, a Nevada corporation; GAMING  
 43 SPECIALIZED LOGISTICS LLC, a Nevada  
 44 limited liability company; LINYI FENG, an  
 45 individual; ROY KELCEY ALLISON, an  
 46 individual; DARYN KIELY, an individual; and  
 47 YI ZHAO, an individual,

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**Defendants.**

1       Defendant Yi Zhao (“Defendant”) moves this Court to strike a document from the record  
2 that was inadvertently added to the end of an exhibit so as to protect the confidential information  
3 in that document. Specifically, Defendant asks the Court to order that the document currently  
4 docketed as ECF No. 81-1 be stricken from the record in its entirety and to replace that document  
5 with the document attached to this motion as Exhibit A, which should be docketed as the new ECF  
6 No. 81-1. The motion is unopposed.

7       The current docketed version of ECF No. 81-1 is 46 pages long and labeled as Exhibit A.  
8 Pages 1-31 are correct and properly redacted. Pages 32-46 of the current ECF No. 81-1 are  
9 additional, unrelated pages that were inadvertently attached to the exhibit and contain information  
10 that was previously marked as confidential.

11       To fix that administrative issue, Defendant files this motion to strike the current ECF No.  
12 81-1 from the record to maintain that confidentiality and to docket the document attached to this  
13 motion as Exhibit A in its place. The attached Exhibit A is 31 pages long and is identical to pages  
14 1-31 of the document currently docketed as ECF No. 81-1. If this motion is granted and the attached  
15 Exhibit A is added to the docket, no new information will be added to the record; only the  
16 inadvertently added pages will be removed.

17       Defendant asks the Court to protect the confidential information in those additional pages  
18 by removing them from the record until the parties can brief the Court as to whether those  
19 confidential materials should be permanently sealed and redacted. *See* ECF No. 82. As the Court  
20 has not ruled on Defendant’s motion, good cause exists to strike and replace the document currently  
21 docketed as ECF No. 81-1.

22       Accordingly, Defendant Yi Zhao respectfully requests the Court (1) strike the document  
23 currently docketed as ECF No. 81-1 from the record and (2) replace that document with the  
24 document attached to this motion as Exhibit A, and (3) label and link that new document as ECF  
25 No. 81-1.

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2 DATED this 4th day of June, 2025.  
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9 */s/ Patrick J. Reilly*  
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22 *Attorneys for Yi Zhao*  
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25 **ORDER**  
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27 The Court, having reviewed the above motion, and finding good cause therein, hereby  
28 **GRANTS** the motion. The Clerk of the Court is **ORDERED** to **STRIKE** the document currently  
1 docketed as ECF No. 81-1 from the record in its entirety and **REPLACE** that document with the  
2 document attached to Defendants' motion as Exhibit A. That new document shall be labeled and  
3 linked on the docket as ECF No. 81-1.

4 **IT IS SO ORDERED.**  
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8 UNITED STATES Magistrate Judge  
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11 DATED: \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that the foregoing *Unopposed Motion to Strike and Replace ECF No. 81-1* was served via electronic service on the 4<sup>th</sup> day of June 2025, to all parties on the CM/ECF service list.

/s/ Patrick J. Reilly

Patrick J. Reilly

## **CERTIFICATE OF CONFERENCE**

I certify that counsel for the parties conferred regarding the relief requested in *Unopposed Motion to Strike and Replace ECF No. 81-1*; counsel for Plaintiffs stated that Plaintiffs are unopposed to the relief requested.

/s/ Patrick J. Reilly

Patrick J. Reilly